

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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In the Matter of the Application of San Diego Gas &  
Electric Company (U 902 G) and Southern California  
Gas Company (U 904 G) for Authority to Integrate Their  
Gas Transmission Rates, Establish Firm Access Rights,  
and Provide Off-System Gas Transportation Services

A. 04-12-004  
(Filed December 2, 2004)

**COMMENTS OF SEMPRA LNG ON THE PROPOSED DECISION**

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## **TABLE OF CONTENTS**

|  |           |
|--|-----------|
| <b>TABLE OF AUTHORITIES .....</b>        | <b>ii</b> |
| <b>I. BACKGROUND .....</b>               | <b>2</b>  |
| <b>II. REQUESTED CLARIFICATION .....</b> | <b>4</b>  |
| <b>III. CONCLUSION .....</b>             | <b>7</b>  |

## **TABLE OF AUTHORITIES**

|           |  |             |
|-----------|--|-------------|
| <b>1.</b> | <b><u>Rule 14.3, Rules of Practice and Procedure of the</u></b>            |             |
|           | <b><u>California Public Utilities Commission</u></b> .....                 | <b>1, 7</b> |
| <b>2.</b> | <b><u>Decision 06-04-033, Opinion Regarding the System Integration</u></b> |             |
|           | <b><u>Proposal ( April 13, 2006)</u></b> .....                             | <b>7</b>    |

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In the Matter of the Application of San Diego Gas & Electric Company (U 902 G) and Southern California Gas Company (U 904 G) for Authority to Integrate Their Gas Transmission Rates, Establish Firm Access Rights, and Provide Off-System Gas Transportation Services

A. 04-12-004  
(Filed December 2, 2004)

**COMMENTS OF SEMPRA LNG ON THE PROPOSED DECISION**

In accordance with Rule 14.3 of the Commission's Rules of Practice and Procedure, Sempra LNG hereby submits its comments on the proposed decision of Administrative Law Judge Wong ("Proposed Decision") issued on October 31, 2006 in this proceeding.<sup>1</sup>

The Proposed Decision fairly and effectively balances the diverse interests of the parties to this proceeding. In adopting, with appropriate modifications, the firm access rights ("FAR") proposal of Southern California Gas Company ("SoCalGas") and San Diego Gas & Electric Company ("SDG&E"), the Proposed Decision provides gas consumers and market participants the necessary assurance that natural gas supplies will be able to access the southern California market.

The Proposed Decision further recognizes the importance of providing new gas supply sources with access to the SoCalGas/SDG&E system on a basis comparable to

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<sup>1</sup> Sempra LNG has no comments on the Alternate Proposed Decision of Commissioner Brown.

existing supplies. The Proposed Decision enables such access through a Step 1 set-aside to parties funding new receipt capacity on an incremental basis. Although a number of parties, including Sempra LNG, expressed a preference for the Joint Proposal, the Step 1 set-aside contemplated by the Proposed Decision would accomplish the same general objectives. Contrary to the assertions of several parties that oppose firm access rights in any form, the Proposed Decision demonstrates that the key elements of the Joint Proposal can be effectively incorporated into the SoCalGas/SDG&E FAR proposal.

Sempra LNG therefore supports the findings and conclusions reflected in the Proposed Decision, subject to one clarification discussed below. The clarification suggested by Sempra LNG addresses the Step 1 set-aside granted to parties that fund new displacement capacity at the Otay Mesa receipt point. By further defining the limited circumstances under which such capacity will be subject to proration, the requested clarification will optimize the incorporation of the Joint Proposal into the utilities' FAR proposal and will ensure that gas consumers will be able to realize fully the benefits of new supplies delivered through the use of displacement capacity. This clarification does not adversely impact other supply sources.

## **I. BACKGROUND**

Although the Proposed Decision does not adopt the Joint Proposal on a stand alone basis, it does incorporate a number of the key elements of the Joint Proposal into the system of FARs proposed by the utilities. The Proposed Decision correctly notes that “the premise of the Joint Proposal is that a firm scheduling right to capacity is created for new or expanded receipt points that are built on a displacement capacity or expansion

capacity basis, and paid for by a funding party.”<sup>2</sup> The Proposed Decision converts the “scheduling right” that would have been granted under the Joint Proposal into a FAR under the utilities’ proposal by granting to parties that have funded new receipt capacity a Step 1 set-aside for that capacity.

With regard to this Step 1 set-aside, the Proposed Decision contains a discussion of the difference between “expansion” capacity and “displacement” capacity and the treatment of each of these two types of capacity under the Joint Proposal. The Joint Proposal defines “expansion capacity” as capacity that “increases the overall downstream capacity of the SoCalGas/SDG&E system.”<sup>3</sup> The Joint Proposal further defines “displacement capacity” as capacity that “increases the takeaway capacity from a receipt point but does not add to the overall downstream capacity of the SoCalGas/SDG&E backbone transmission system.”<sup>4</sup> The scheduling right for displacement capacity under the Joint Proposal is “subject to reduction only to accommodate, on a nondiscriminatory basis ..., nominations at other receipt points in the same [t]ransmission [z]one and to accommodate force majeure, scheduled maintenance, or unscheduled maintenance situations as defined in SoCalGas Rules 1 and 23.”<sup>5</sup>

The Joint Proposal further addresses displacement capacity in the Southern Zone, where the Otay Mesa receipt point will be located once it is completed and placed in service. Under the Joint Proposal, the treatment of displacement capacity in the Southern Zone is generally the same as displacement capacity in other parts of the SoCalGas/SDG&E system. There are, however, specific provisions that address the

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<sup>2</sup> Proposed Decision at p. 68.

<sup>3</sup> Exhibit 85, Attachment A, p. 3.

<sup>4</sup> Id.

<sup>5</sup> Id. at p. 7.

minimum flow requirements, if any, of SoCalGas at Ehrenberg and the possibility of additional displacement capacity at Otay Mesa of up to 700 MMcf/day.

Significantly, the provisions of the Joint Proposal relating to displacement capacity are premised on the assumption that there would be no generally applicable system of FARs. The Proposed Decision notes that the Joint Proposal “is limited to creating scheduling rights for new or expanded receipt point capacity. It does not establish a system of FAR for the existing receipt points.”<sup>6</sup> Accordingly, the limitations on displacement capacity were added to the Joint Proposal primarily to address the situation where, **in the absence of a system of FARs**, Cycle 1 nominations into the Southern Zone could exceed the available takeaway capacity. In such a situation, prorationing would be necessary to preserve the ability of existing supply sources to access the utilities’ system. As shown below, such prorationing is not necessary (except in the limited cases of force majeure or system maintenance) under the generally applicable system of FARs that would be adopted by the Proposed Decision. This is because the amount of FARs awarded would not exceed the firm takeaway capacity of the Southern Zone.

## II. REQUESTED CLARIFICATION

With regard to new displacement capacity at the Otay Mesa receipt point, the Proposed Decision states that:

“If a funding party builds new capacity or expands existing capacity on a

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<sup>6</sup> Proposed Decision at p. 68.

displacement capacity basis at Otay Mesa, and the funding party pays for it on an incremental basis, the funding party shall receive a Step 1 set-aside at Otay Mesa for the capacity that the funding party paid for. The capacity shall be subject to the scheduling right limitations described in section 7.b. of Exhibit A of Exhibit 85.”<sup>7</sup>

Section 7.b of the Joint Proposal ( which is Exhibit A of Exhibit 85) provides for a pro rata allocation of the displacement capacity at Otay Mesa with the capacity at other receipt points **if total scheduled Cycle 1 quantities exceed the 1210 MMcf/day of firm takeaway capacity in the Southern Zone**. Section 7.b., therefore, does not contemplate that there would be a system of FARs in the Southern Zone. In the absence of FARs, Cycle 1 nominations could exceed the 1210 MMcf/day of firm takeaway capacity, which would make a pro rata allocation necessary.

Under a system of FARs, however, the utilities will only award FARs in the Southern Zone in an amount equal to or less than the aggregate firm takeaway capacity of the Southern Zone. In other words, the total FARs awarded at Ehrenberg, Blythe/North Baja and Otay Mesa (including the displacement capacity of 400 MMcf/day at Otay Mesa that will be subject to the Step 1 set-aside) will not exceed 1210 MMcf/day. Thus, absent an event of force majeure, or scheduled or unscheduled maintenance, there will be no need to prorate primary firm volumes in the Southern Zone.

Sempre LNG and any other holders of FARs that result from the Otay Mesa displacement capacity will be paying not only for the incremental costs of adding that capacity, but also the \$.05 FAR reservation rate. Under the utilities’ FAR proposal, the payment of this reservation rate results in a firm right at the primary receipt point, which in this case will be Otay Mesa. That firm right should be subject to proration only to the

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<sup>7</sup> Proposed Decision at p. 73.



extent necessary to preserve the primary firm rights of other parties in the Southern Zone.

Therefore, Sempra LNG requests the following clarification to the Proposed Decision:

- (1) The FARs resulting from the displacement capacity of up to 700 MMcf/day at Otay Mesa (“Otay Mesa FARs”) shall be subject to proration only in the event of force majeure or scheduled or unscheduled maintenance that reduces the firm takeaway capacity of the Southern Zone.
- (2) In the event of such force majeure or maintenance, the Otay Mesa FARs shall be prorated to the extent necessary to preserve the utilization of FARs with primary rights at other receipt points in the Southern Zone to the extent such FARs are not the result of displacement capacity. The Otay Mesa FARs shall not be subject to proration with, or as a result of, nominations for alternate firm or interruptible service.

This clarification preserves the rights of parties holding FARs with primary rights at a receipt point in the Southern Zone that result from existing or expansion capacity. Those parties will in no way be adversely affected by the Step 1 set-aside of displacement capacity at Otay Mesa. Indeed, the clarification expressly provides that the displacement capacity at Otay Mesa will be prorated to the extent necessary to preserve the primary firm rights of other parties.

This clarification will also enhance the benefits of the FAR proposal to California gas consumers. The Commission has previously found that new LNG supplies from Otay

Mesa are expected to provide substantial benefits to the southern California market.<sup>8</sup> In order for end users and other gas consumers to realize those benefits, the new supplies must be able to access the SoCalGas/SDG&E system on a reliable and consistent basis.

### **III. CONCLUSION**

For the foregoing reasons, Sempra LNG respectfully requests that the Commission clarify the Proposed Decision in the manner set forth herein. In accordance with Rule 14.3(a) of the Commission's Rules of Practice and Procedure, attached hereto is an Appendix setting forth Sempra LNG's suggested changes to the Proposed Decision.

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<sup>8</sup> Decision 06-04-033, Opinion Regarding the System Integration Proposal (April 13, 2006) at p. 47.

Dated: November 20, 2006

Respectfully submitted,

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## APPENDIX

**Page 73: The following should be added at the end of the last sentence of the second full paragraph on page 73 of the Proposed Decision:**

“, subject to the following clarification to reflect the incorporation of the Joint Proposal into the generally-applicable system of FARs adopted in this Decision:

- (i) The FARs resulting from the displacement capacity of up to 700 MMcf/day at Otay Mesa (“Otay Mesa FARs”) shall be subject to proration only in the event of force majeure or scheduled or unscheduled maintenance that reduces the firm takeaway capacity of the Southern Zone.
- (ii) In the event of such force majeure or maintenance, the Otay Mesa FARs shall be prorated to the extent necessary to preserve the utilization of FARS with primary rights at other receipt points in the Southern Zone to the extent such FARS are not the result of displacement capacity. The Otay Mesa FARs shall not be subject to proration with, or as a result of, nominations for alternate firm or interruptible service.”

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the **COMMENTS OF SEMPRA LNG ON THE PROPOSED DECISION** has been electronically mailed to each party of record on the service list in **A.04-12-004**. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to the Assigned Administrative Law Judge John S. Wong and Commissioner Geoffrey Brown.

Executed this 20<sup>th</sup> day of November, 2006 at San Diego, California.

/s/ LISA FUCCI-ORTIZ

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Lisa Fucci-Ortiz

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**[Top of Page](#)**

**[Back to INDEX OF SERVICE LISTS](#)**